

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

UNITED STATES OF AMERICA

v.

Case number: 2:21-cr-00127

RAYMOND DUGAN

DEFENDANT’S MOTION TO CONTINUE TRIAL

Now comes the defendant, Raymond Dugan, by counsel, David Schles, and moves this Court to continue the trial in this matter, In support of this motion the defendant avers:

1. Mr. Dugan was arraigned on August 17, 2021. The trial is currently scheduled for May 17, 2022.

2. Counsel’s brother is being treated for Stage IV colon cancer in Pittsburgh. He has suffered a setback and has been hospitalized at West Penn Hospital. Counsel needs to travel to Pittsburgh to be with him and to assist in making decisions concerning his treatment and care. Counsel is the only person available as my brother has never married and has no children; our other brother lives in Germany and is not able to travel on a short time frame.

3. Counsel for the defendant has conferred with counsel for the government, Assistant United States Attorney Julie White, and is authorized to inform the Court that the government does not object to the requested continuance. Counsel has also consulted with Mr. Dugan and Mr. Dugan also does not object to a continuance with the understanding this may result in a significant delay in the trial and that all time will be excluded from speedy trial calculations.

Wherefore, in light of the foregoing, the defendant respectfully requests that this Court continue the trial and associated pretrial dates. Defendant respectfully requests that the trial be continued.

Respectfully Submitted,
Raymond Dugan
By counsel,

s/ David Schles
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CERTIFICATE OF SERVICE

I, David Schles, counsel for defendant, Raymond Dugan do hereby certify that on this 13th day of May 20221, the foregoing DEFENDANT’S MOTION TO CONTINUE TRIAL was served upon the following by CM/EMF electronic filing:

Julie M. White
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s/ David Schles
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